

EXHIBIT A

FILED
12/21/2020 2:30 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2020CH07372

11581550

2120 - Served 2121 - Served 2620 - Sec. of State
2220 - Not Served 2221 - Not Served 2621 - Alias Sec of State
2320 - Served By Mail 2321 - Served By Mail
2420 - Served By Publication 2421 - Served By Publication
Summons - Alias Summons

(12/01/20) CCG 0001 A

FILED DATE: 12/21/2020 2:30 PM 2020CH07372

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Name all Parties

ASHLEY VELA, on behalf of herself and all others similarly situated,

Plaintiff(s)

ITX HEALTHCARE, LLC

Case No. 2020CH07372

Defendant(s)

c/o Illinois Corporation Service
801 Alhai Stevenson Dr., Springfield, IL 62703

Address of Defendant(s)

Please serve as follows (check one): Certified Mail Sheriff Service Alias

SUMMONS

To each Defendant:

You have been named a defendant in the complaint in this case, a copy of which is hereto attached. You are summoned and required to file your appearance, in the office of the clerk of this court, within 30 days after service of this summons, not counting the day of service. If you fail to do so, a judgment by default may be entered against you for the relief asked in the complaint.

THERE WILL BE A FEE TO FILE YOUR APPEARANCE.

To file your written appearance/answer **YOU DO NOT NEED TO COME TO THE COURTHOUSE**. You will need: a computer with internet access; an email address; a completed Appearance form that can be found at <http://www.illinoiscourts.gov/Forms/approved/procedures/appearance.asp>; and a credit card to pay any required fees.

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois
cookcountyclerkofcourt.org

Page 1 of 3

Summons - Alias Summons

(12/01/20) CCG 0001 B

E-filing is now mandatory with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider.

If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/faq/gethelp.asp> or talk with your local circuit clerk's office. If you cannot e-file, you may be able to get an exemption that allows you to file in-person or by mail. Ask your circuit clerk for more information or visit www.illinoislegalaid.org.

If you are unable to pay your court fees, you can apply for a fee waiver. For information about defending yourself in a court case (including filing an appearance or fee waiver), or to apply for free legal help, go to www.illinoislegalaid.org. You can also ask your local circuit clerk's office for a fee waiver application.

Please call or email the appropriate clerk's office location (on Page 3 of this summons) to get your court hearing date AND for information whether your hearing will be held by video conference or by telephone. The Clerk's office is open Mon - Fri, 8:30 am - 4:30 pm, except for court holidays.

NOTE: Your appearance date is NOT a court date. It is the date that you have to file your completed appearance by. You may file your appearance form by efiling unless you are exempted.

A court date will be set in the future and you will be notified by email (either to the email address that you used to register for efiling, or that you provided to the clerk's office).

CONTACT THE CLERK'S OFFICE for information regarding COURT DATES by visiting our website: cookcountyclerkofcourt.org; download our mobile app from the AppStore or Google play, or contact the appropriate clerk's office location listed on Page 3.

To the officer: (Sheriff Service)

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so endorsed. This summons may not be served later than thirty (30) days after its date.

Atty. No.: 60070
Pro Se 99500

Name: Michael Wood

Atty. for (if applicable):

Community Lawyers LLC

Address: 20 N. Clark Street, Suite 3100

City: Chicago

State: IL Zip: 60603

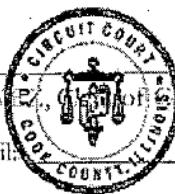
Telephone: (312) 757-1880

Primary Email: mwood@communitylawyersgroup.com

Witness date 12/21/2020 2:30 PM IRIS Y. MARTINEZ

IRIS Y. MARTINEZ, Clerk of the Circuit Court

Service by Certified Mail:



Date of Service: _____
(To be inserted by officer on copy left with employer or other person)

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois

cookcountyclerkofcourt.org

Page 2 of 3

Return Date: No return date scheduled
 Hearing Date: 4/20/2021 10:00 AM - 10:00 AM
 Courtroom Number: 2405
 Location: District 1 Court
 Cook County, IL

FILED
 12/18/2020 4:54 PM
 IRIS Y. MARTINEZ
 CIRCUIT CLERK
 COOK COUNTY, IL
 2020CH07372

11566308

Chancery Division Civil Cover Sheet
 General Chancery Section

(12/01/20) CCC 0623

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, CHANCERY DIVISION

ASHLEY VELA

Plaintiff

ITX HEALTHCARE, LLC

Defendant

2020CH07372

Case No: _____

**CHANCERY DIVISION CIVIL COVER SHEET
 GENERAL CHANCERY SECTION**

A Chancery Division Civil Cover Sheet - General Chancery Section shall be filed with the initial complaint in all actions filed in the General Chancery Section of Chancery Division. The information contained herein is for administrative purposes only. Please check the box in front of the appropriate category which best characterizes your action being filed.

Only one (1) case type may be checked with this cover sheet.

- | | | | |
|------|--|-----------------------|---|
| 0005 | Administrative Review | 0017 | Mandamus |
| 0001 | <input checked="" type="checkbox"/> Class Action | 0018 | Ne Exeat |
| 0002 | Declaratory Judgment | 0019 | Partition |
| 0004 | Injunction | 0020 | Quiet Title |
| 0007 | General Chancery | 0021 | Quo Warranto |
| 0010 | Accounting | 0022 | Redemption Rights |
| 0011 | Arbitration | 0023 | Reformation of a Contract |
| 0012 | Certiorari | 0024 | Rescission of a Contract |
| 0013 | Dissolution of Corporation | 0025 | Specific Performance |
| 0014 | Dissolution of Partnership | 0026 | Trust Construction |
| 0015 | Equitable Lien | 0050 | Internet Take Down Action (Compromising Images) |
| 0016 | Interpleader | Other (specify) _____ | |

• Atty. No.: 60070 Pro Se 99500Atty Name: Michael J. WoodAtty. for: Community Lawyers LLCAddress: 20 N. Clark Street, Suite 3100City: Chicago State: ILZip: 60603Telephone: 312-757-1880Primary Email: mwood@communitylawyersgroup.com

Pro Se Only: I have read and agree to the terms of the Clerk's Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's office for this case at this email address:

Email: _____

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois
 cookcountyclerkscourt.org

Page 1 of 1

Firm No. 60070

IN THE
CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

ASHLEY VELA,)
on behalf of herself and all others)
similarly situated,)
Plaintiff,) Case No. 2020CH07372
vs.) Jury Demanded
ITX HEALTHCARE, LLC.,)
Defendant.)

COMPLAINT

Plaintiff, Ashley Vela, on behalf of herself and a punitive class, brings this action under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (“FDCPA”), and alleges:

PARTIES

1. Plaintiff, Ashley Vela (“Plaintiff”), is a resident of the State of Illinois, from whom Defendant attempted to collect an alleged debt for personal services. Plaintiff has never owned a business nor taken on any commercial debt. Plaintiff is thus a “consumer” as that term is defined in 15 U.S.C. § 1692a(3) of the FDCPA.

2. Defendant, ITX Healthcare, LLC (“ITX”) is an Ohio limited liability company that does or transacts business in Illinois. Its registered agent is Illinois Corporation Service, 801 Adlai Stevenson Drive, Springfield, Illinois, 62703.

3. ITX is engaged in the business of a collection agency, using the mails and telephone to collect consumer debts originally owed to others.

4. ITX maintains a website,

<https://www.healthcarerevenuercoverygroup.com/>.

5. As of the date of the filing of this action, the website reads in part:

This is an attempt to collect a debt. Any information obtained will be used for that purpose. This communication is from a debt collector.

Excerpted on March 11, 2020 from: <https://www.healthcarerevenuercoverygroup.com/>.

6. ITX holds a collection agency license from the State of Illinois.

7. ITX regularly collects or attempts to collect defaulted consumer debts due or asserted to be due another, and is a “debt collector” as defined in 15 U.S.C. § 1692a(6) of the FDCPA.

FACTUAL ALLEGATIONS

8. Defendant transacts business in Cook County, Illinois, including the collection of medical debts from Cook County residents.

9. According to Defendant, Plaintiff incurred an alleged debt for a consumer account, reference number 32785971 (“alleged debt”). The alleged debt is thus a “debt” as that term is defined at § 1692a(6) of the FDCPA.

10. Due to her financial circumstances, Plaintiff was unable to pay any debts, and the alleged debt went into default.

11. ITX subsequently began collection activities on the alleged debt.

12. On or about September 9, 2020, ITX sent Plaintiff a Letter collect the debt (“Letter”) in an attempt to collect the alleged debt. (Exhibit A, ITX Letter)

13. The Letter conveyed information regarding the alleged debt, including the name of the debt collector and the fact that the letter was an attempt to collect the debt.

14. The Letter was thus a communication as that term is defined at §1692a(2) of the FDCPA.

15. The Letter was ITX’s initial communication with Plaintiff concerning the alleged debt.

16. The Letter states “This is an attempt to collect a debt...”

17. The Letter states “ITx Healthcare has received your account from Northwestern Medicine.”

18. The Letter further states “[p]ayment can also be sent to ITx Healthcare, LLC. P.O. Box 360 Findlay, OH 45839-0360.

19. Plaintiff believed ITx Healthcare was a medical provider.

20. Plaintiff believed ITx Healthcare was attempting to collect a medical debt from her that it owned.

21. The unsophisticated consumer would believe the Letter was attempting to collect a debt owned by ITx Healthcare.

22. In fact the current creditor of the alleged debt is not ITx Healthcare.

23. The Letter does not disclose the name of the creditor to whom the debt is owed.

24. 15 U.S.C. § 1692g of the FDCPA provides as follows:

Validation of debts

(a) Notice of debt; contents

Within five days after the initial communication with a consumer in connection with the collection of any debt, a debt collector shall, unless the following information is contained in the initial communication or the consumer has paid the debt, send the consumer a written notice containing—

(2) the name of the creditor to whom the debt is owed;

25. ITx failed to identify the creditor to whom the debt was owed, in violation of 15 U.S.C. § 1692(g)(a)(2).

26. Defendant's collection communications are to be interpreted under the "unsophisticated consumer" standard. *Gammon v. GC Services, Ltd. Partnership*, 27 F.3d 1254, 1257 (7th Cir. 1994).

CLASS ALLEGATIONS

27. Plaintiff, Ashley Vela, brings this action individually and as a class on behalf of (1) all persons similarly situated in the United States of America (2) from whom ITX attempted to collect a debt (3) by mailing a letter substantially similar to Exhibit A of Plaintiff's Complaint (4) which does not contain the words "creditor" or "current creditor" (5) which was mailed during the period of time that begins one year prior to the filing of this Class Action Complaint, and ends on the date of filing of this Class Action Complaint.

28. Exhibit A is a form letter.

29. Plaintiff's claims are typical of the claims of the Class. Common questions of law or fact raised by this class action complaint affect all members of the Class and predominate over any individual issues. Common relief is therefore sought on behalf of all members of the Class. This class action is superior to other available methods for the fair and efficient adjudication of this controversy.

30. The prosecution of separate actions by individual members of the Class would create a risk of inconsistent or varying adjudications with respect to individual members of the Class and would, as a practical matter, either be dispositive of the interests of other members of the Class not party to the adjudication, or substantially impair or impede their ability to protect their interests.

31. Plaintiff will fairly and adequately protect and represent the interests of the Class. The management of the class action proposed is not extraordinarily difficult, and the factual and legal issues raised by this class action complaint will not require extended contact with the members of the Class, because ITX's conduct was perpetrated on all members of the Class and will be established by common proof.

32. Moreover, Plaintiff has retained counsel that has been certified as class counsel in prior cases, including class actions brought under the FDCPA.

COUNT I—FAIR DEBT COLLECTION PRACTICES ACT

33. Plaintiff re-alleges the above paragraphs as if set forth fully in this count.

34. ITx Healthcare failed to effectively state the name of the current creditor to whom a debt is owed, in violation of 15 U.S.C. § 1692g(a)(2).

WHEREFORE, Plaintiff respectfully requests that the Court enter judgment in favor of Plaintiff and against Defendant as follows:

- A. Statutory damages pursuant to 15 U.S.C. § 1692k(a)(2)(B);
- B. Costs and reasonable attorney fees pursuant to 15 U.S.C. § 1692k(a)(3);
- C. Such other or further relief as the Court deems proper.

JURY DEMAND

Plaintiff demands trial by jury.

By: /s/ Michael Wood
Plaintiff's Attorney

Michael Wood
Celetha Chatman
Community Lawyers LLC
20 N. Clark Street, Suite 3100
Chicago, IL 60603
Ph: (312) 757-1880
Fx: (312) 265-3227
cchatman@communitylawyersgroup.com

Return Date: No return date scheduled
Hearing Date: 4/20/2021 10:00 AM - 10:00 AM
Courtroom Number: 2405
Location: District 1 Court
Cook County, IL

FILED
12/18/2020 4:54 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2020CH07372

11566308

EXHIBIT A

PO Box 1260
Oaks PA 19456-1260
ADDRESS SERVICE REQUESTED



September 9, 2020

PL95 613752844

Ashley Vela

Provider: Northwestern Medicine
Account #: 889606
Patient #: 32785971
Treatment Date: 03/19/2019
Open Balance: \$17.86

Dear Ashley Vela,

ITx Healthcare, LLC has received your account from Northwestern Medicine with a patient open balance (debt) that is still unpaid. We know how confusing healthcare account statements and Explanation of Benefits (EOBs) can be, especially in today's healthcare insurance environment.

We are here to take away any concerns you may have in working through a solution to resolve your patient open balance account. Northwestern Medicine values you as a patient and looks forward to continuing to meet your healthcare needs. They have authorized us to reach out to you to try to help manage this account to resolution.

Please call us at your convenience and we can assist you with any questions or concerns regarding this account. Our goal is to resolve the account quickly and easily while considering your current circumstances. This is consistent with our PatientSAFE™ promise. Thank you in advance for your attention in resolving this matter and we look forward to your call.

Please Call Our Patient Contact Center Toll Free:



1-855-803-9848



Unless within thirty days after receipt of this notice you dispute the validity of this debt, or any portion thereof, we will assume the debt is valid. If you notify us in writing within the thirty-day period that the debt, or any portion thereof, is disputed, we will obtain verification of the debt or a copy of a judgment (if any) against you and a copy of such verification or judgment (if any) will be mailed to you by us. Upon your written request within the thirty-day period, we will provide you with the name and address of the original creditor, if different from the current creditor.

ITx Healthcare, LLC is a PatientSAFE™ company and will treat you with the utmost dignity, respect and privacy you deserve as a patient. Please call us today and we will assist you in resolving your account. Payment can also be sent to ITx Healthcare, LLC, P.O. Box 360 Findlay, OH 45839-0360.

Best Regards,

ITx Healthcare™
Account Resolution Team



OPEN BALANCE \$17.86	CALL OUR PATIENT CONTACT CENTER TO HELP RESOLVE YOUR PATIENT ACCOUNT 1-855-803-9848
Monday - Friday 8:00am - 6:00pm	

B19ONTEL01PL96



To make a payment online, please log into our web site at www.itxcompanies.com.

This is an attempt to collect a debt by a debt collector.
Any information obtained will be used for that purpose.

CALIFORNIA

The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8:00 a.m. or after 9:00p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or www.ftc.gov. Non profit credit counseling services may be available in the area.

COLORADO

FOR MORE INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE WWW.COLORADOATTORNEYGENERAL.GOV/CA. A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prohibit the debt collector or collection agency from taking any other action authorized by law to collect the debt. THE ADDRESS AND TELEPHONE NUMBER FOR CLIENT SERVICES, INC.'S LOCAL COLORADO OFFICE IS: The Executive Building, Attn: Stokes & Wolf, P.C. as agent for Client Services, Inc., 1776 S. Jackson St., Suite 900 Denver, CO 80210 (TEL: (303) 753-0945).

KANSAS

An investigative consumer report, which includes information as to your character, general reputation, personal characteristics and mode of living, has been requested. You have the right to request additional information, which includes the nature and scope of the investigation.

MASSACHUSETTS

NOTICE OF IMPORTANT RIGHTS: You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only ten days unless you provide written confirmation of the request postmarked or delivered within seven days of such request. You may terminate this request by writing to the debt collector.

MINNESOTA

This collection agency is licensed by the Minnesota Department of Commerce.

NEW YORK CITY

New York City Department of Consumer Affairs License Number: 1306512

NORTH CAROLINA

North Carolina Permit Number: 100705

TENNESSEE

This collection agency is licensed by the Collection Service Board of the Department of Commerce and Insurance.